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Thelasvegasdefender@gmail.com  
6 Attorney for Defendant George McKenna

7 UNITED STATES DISTRICT COURT  
8 DISTRICT OF NEVADA

9 \* \* \*

10 )  
11 UNITED STATES OF AMERICA )

12 Plaintiff, )

13 vs. )

14 JACOB VILLANUEVA, JR. et al., )

15 Defendants. )

CASE NO.: 2:12-CR-0082

16 DEFENDANT GEORGE MCKENNA'S  
17 UNOPPOSED MOTION TO CONDUCT  
18 A PRE-PLEA PRESENTENCING  
INVESTIGATION REPORT AND  
PROPOSED ORDER

19 Comes now, appointed counsel Phil Brown Esq., and hereby moves this Court request a  
20 Pre-Plea Presentence Investigation Report be prepared by the Probation Department.

21 1) It appears that defendant may be subject to substantially different sentencing ranges  
22 depending upon his verified criminal history as well as other factors surrounding his offense  
23 and plea. Defendant McKenna's decision regarding how to proceed may be drastically  
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1 impacted by his sentencing exposure in this regard. The pre-plea presentence report will  
2 promote judicial economy and aid in the manner in which this case is ultimately resolved.

3 2) Undersigned counsel therefore respectfully requests an order that the Department of  
4 Probation conduct a pre-plea presentence investigation report as soon as possible.  
5

6 3) Undersigned counsel has spoken to the prosecutor, Assistant United States Attorney  
7 Kimberly Frayn regarding this request and she has no opposition.  
8

9 DATED this 10th day of July, 2012.  
10

11  
12 /s/Philip H. Brown  
13 PHILIP H. BROWN, ESQ.  
14 200 HOOVER AVE, SUITE #130  
15 LAS VEGAS, NEVADA 89101  
16 ATTORNEY FOR THE DEFENDANT  
17 GEORGE McKENNA  
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12 vs. )

13 JACOB VILLANUEVA, et. al., )

14 Defendants. )  
15 )  
16 )  
17 )

CASE NO.: 2:12-CR-0082

**ORDER GRANTING DEFENDANT**  
**GEORGE McKENNA'S UNOPPOSED**  
**MOTION FOR PRE-PLEA**  
**PRESENTENCING INVESTIGATION**  
**REPORT**

18 IT IS HEREBY ORDERED that the Probation Department will prepare a Pre-Sentence  
19 Investigation Report on Defendant George McKenna.

20 DATED this the 11th  
21 day of July, 2012.

22  
23  
24   
25 U.S. DISTRICT JUDGE  
26  
27  
28

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee of Brown Law Offices, Chartered, and is a person of such age and discretion as to be competent to serve papers.

That on July 10, 2012, she served an electronic copy of the above and foregoing UNOPPOSED MOTION TO CONDUCT A PRE-PLEA PRESENTENCING INVESTIGATION REPORT by electronic service (ECF) to the person named below:

DANIEL BOGDON  
United States Attorney

KIMBERLY FRAYN  
Assistant United States Attorney  
333 Las Vegas Blvd. So., 5<sup>th</sup> Floor  
Las Vegas, NV 89101

/s/ Mary D. Brown

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Employee of Brown Law Offices, Chartered